

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MISSOURI
3 EASTERN DIVISION
4 AMIE LITTLEFIELD,)
5)
6 Plaintiff,)
7)
8 vs.) Cause No. 4:21-CV-304-SEP
9)
10 AMERICAN ALTERNATIVE INSURANCE)
11 CORPORATION,)
12)
13 Defendant.)
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19 VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF AMIE LITTLEFIELD
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1 believe. Maybe 2007.

2 Q Your date of birth is January 5 of 1979?

3 A Third.

4 Q Third. My mistake.

5 Okay. And so understanding if I refer to
6 the subject incident, you know that we're here today
7 to discuss an incident that occurred on January 24
8 [sic] of 2010; correct?

9 A Yes.

10 Q So if I say "the subject incident" or
11 something like that, you understand that we're talking
12 about that day; correct?

13 A Yes, sir.

14 MR. WINEBRIGHT: I don't mean to cut you
15 off, but I think you said January 24. Do you mean
16 November 24?

17 MR. PLUNKERT: I do mean November. I'm
18 sorry if I said January.

19 Q (By Mr. Plunkert) November 24 of 2010 is the
20 subject incident; right, Ms. Littlefield?

21 A Yes. I believe so.

22 Q And were you married on that day?

23 A No, sir.

24 Q Do you have any children?

25 A I do.

1 forwards or backwards at this point.

2 Q Okay. When you had your -- well, why don't
3 you tell me what you remember took place?

4 A I, I was in the back taking care of the
5 patient. I knew we were coming into St. Luke's. So I
6 was, I believe, getting up to transfer oxygen from the
7 main tank in the ambulance to the portable tank on the
8 stretcher, which is something we often do. And, and
9 just kind of got thrown around a bit. That's really
10 all I can tell you about it.

11 Q When, when -- so the ambulance, well, did
12 the ambulance stop?

13 A It did, but then it started moving again.

14 Q So you had -- I guess what I'm trying to
15 find out is when you contend that you sustained that
16 shoulder injury to your right shoulder, was it because
17 the ambulance stopped or it because it started or was
18 it something else?

19 A No. It was the stop.

20 Q Okay. And which direction were you facing
21 when the ambulance stopped?

22 A So I was holding onto one of the overhead
23 bars with my right hand, and I think I was kind of in
24 the middle of reaching for the oxygen tubing at the
25 time. So I might have even been twisted a little bit.

1 But I think I was facing toward the back of the
2 ambulance, towards of patient, or kind of twisted in
3 between facing the driver's side wall for the oxygen.

4 So I was, I really -- that's, that's my
5 memory of it, is trying to do that in that general
6 time frame.

7 Q Okay. And you referenced either reaching,
8 in the middle of reaching toward the driver side
9 wall -- or what other location did you mention?

10 A Or towards the stretcher itself. I was
11 transferring oxygen tubing from the -- I believe I was
12 transferring oxygen tubing or at least in the process
13 of attempting to from our main tank --

14 I'm sorry.

15 Q It's all right. You got a cat. You got a
16 friend.

17 A It was either this or get fed -- so.

18 Yeah. I was -- I was trying to get the
19 oxygen from the main tank, which is a larger tank, to
20 the small portable on the stretcher so we could take
21 him inside.

22 Q And "take him" being the patient; right?

23 A Yes.

24 Q And the patient being Donald Seals; is that
25 your recollection?

1 A I have no idea.

2 Q And the reason I'm asking which direction
3 you're facing, because when the ambulance stopped, I
4 was maybe going to get an idea of which, which
5 direction your inertia took you in reference to the
6 driver of the ambulance or the rear of the ambulance?

7 A I wish I could tell you, but it's been a
8 very long time.

9 Q Okay. Did you ever see a vehicle -- because
10 again, I can take you back here. It's -- I'll share
11 the screen. Give me a second.

12 Okay. And it says the ambulance and the
13 other vehicle never collided. So what I wanted to ask
14 you about was this other vehicle that's referenced in
15 your interrogatory answer No. 3 of Exhibit E. Did you
16 ever see that other vehicle?

17 A No. That was based on information from my
18 partner after we stopped and he came around the back,
19 he apologized for slamming on the brakes and told me
20 that there was a vehicle.

21 Oh, my goodness. You are being a little
22 troublesome. I apologize. Excuse me for a moment.

23 MR. PLUNKERT: That's okay. For the record,
24 she's speaking to her cat, not defense counsel.

25 THE WITNESS: Okay. Everybody out. I

1 A No.

2 MR. WINEBRIGHT: Objection. Calls for
3 speculation. You can answer, Amie.

4 THE WITNESS: I'm sorry. I already
5 answered. I said no.

6 Q **(By Mr. Plunkert) And that's just based on**
7 **your recollection of, of what occurred; is that**
8 **correct?**

9 A Yes.

10 Q **So did you report the incident to -- do you**
11 **know who AAIC is?**

12 A No.

13 Q **Okay. Do you know who you're suing in this**
14 **lawsuit?**

15 A An insurance company from what I understand.

16 Q **Do you know which one?**

17 A Not specifically, no. I believe it was at
18 the top of the papers. But it's -- sorry. Go ahead.

19 Q **So that insurance company, AAIC, my question**
20 **is, had you ever reported this incident to AAIC before**
21 **November of 2020?**

22 A **Not to my knowledge. I, I wouldn't have**
23 **known to. And that's why I hired attorneys to help me**
24 **through this process.**

25 Q **But you hired an attorney to help you out**